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Washington County Consolidated Communications Agency

November 25th, 2002

Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WT Docket No. 02-285 RM-1077, Amendment of Sections 90.20 and 90.175 of the Commission's Rules for Frequency Coordination of Public Safety Frequencies in the Private Land Mobile Radio Below-470 MHz Band.

Gentlemen:

In Oregon, my Agency represents Washington and Clackamas counties, these two counties combined have a population of 787,592. Since Oregon only has total population of 3.4 million, my agency represents 23% of the total population in Oregon. Plus, not only do I work closely with Multnomah County, the largest, with its 660,767 population, I offer assistance, with my agency's support, to the smaller counties in Oregon. 1 feel that this fact puts me in a position to have a broad understanding of the frequency requirements for entire State of Oregon. Due to gains in efficiency and budgets constraints more and more County Emergency 911 Communications Centers are consolidating their various frequencies and constructing new systems. A fine example of this is Columbia County. Columbia County is constructing a four (4) site, eight (8) channel simulcast system, using a mixture of VHF police and fire frequencies. This agency (Columbia County) chose APCO as the coordinating service to coordinate the police frequencies. *I* was able work with them on figuring out which frequencies would work in the scheme of things, however, delays will be experienced and additional costs will be added to the project to have the Fire frequencies coordinated. If they had equal access to all frequency pools it would have been very easy to fulfill this agency's needs.

There is a question that there are differences between operations of those frequencies below 512 MHz and those at 800 MHz. Even though frequencies at 800 MHz have provisions

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for exclusive use, these frequencies have suffered massive harmful interference due incompatibilities between public safety systems and CMRS. The interference was identified by the Public Safety Community and Project 39 provided guidance on how to resolve it. Even though frequencies below 512 MHz are considered shared, it is unacceptable to have interference on a first responder **frequency.** And with the build out of VHF trunking systems, interference will be as unacceptable as it is with 800 MHz trunking systems.

With the availability of updated coordinated frequency databases and powerful software predictions tools, such as Comstudy, from RadioSoft, combined with my experience in the radio system engineering field, I feel confident that interference free frequencies can be issued.
Yes, the existing system has worked well in Oregon, but there have been added delays and costs to small agencies that desperately need additional frequencies. Opening up coordination below 470 MHz would speed up the process and save dollars for the small agencies.

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